

1 THE HONORABLE ROBERT J. BRYAN
2
3
4
5
6

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 ERIC KLOPMAN-BAERSELMAN, as Personal
11 Representative for the Estate of RUDIE
12 KLOPMAN-BAERSELMAN, deceased,

Plaintiff,

13 vs.
14
15

AIR & LIQUID SYSTEMS CORPORATION, a
Pennsylvania corporation, individually and as
successor-by-interest to BUFFALO PUMPS, et
al.,

16 Defendants.
17

Civil Action No. 3:18-cv-05536 RJB
DEFENDANT BORGWARNER
MORSE TEC, LLC'S
SUPPLEMENTAL DISCLOSURE OF
EXPERT WITNESSES

Pursuant to Federal Rule of Civil Procedure 26(a)(2), Defendant BorgWarner Morse
TEC, LLC ("BorgWarner") makes the following supplemental disclosure of expert testimony:

BorgWarner incorporates by reference, as if fully reinstated herein, the witnesses,
disclosures, exhibits, and attachments, disclosed in its September 13, 2019 Supplemental
Disclosures, Dkt. #360.

Further, BorgWarner identifies that it may call the following additional witness:

5. Drew Van Orden
RJ Lee Group
350 Hochberg Road
Monroeville, PA 15146

BorgWarner joins and adopts the disclosure for Mr. Van Orden by its co-defendant Genuine Parts Company, including the summary of Mr. Van Orden's anticipated testimony, his curriculum vitae, and list of trial and deposition testimony given, served by Genuine Parts Company on October 15, 2019 (also attached hereto as Exhibits 1, 2, and 3), as well as any future disclosure(s) that may be provided for this witness.

Mr. Van Orden charges \$550 per hour.

Pursuant to Rule 26(e), Defendant BorgWarner Morse TEC LLC and the above named experts will supplement these disclosures to the extent necessary in the event additional information is obtained during the pendency of this action.

DATED this 16th day of October, 2019.

BENNETT BIGELOW & LEEDOM, P.S.

By s/Jennifer G. Crisera
Jennifer G. Crisera, WSBA No. 35385
601 Union Street, Suite 1500
Seattle, Washington 98101-1363
Telephone: (206) 622-5511
Fax: (206) 622-8986
Email: jcrisera@bbllaw.com
Attorneys for BorgWarner

CERTIFICATE OF SERVICE

The undersigned declares as follows:

1. I am employed at Bennett Bigelow & Leedom, PLLC, attorneys of record for Defendant BorgWarner Morse TEC, LLC, herein.

2. On October 16th, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record who are registered as such on the CM/ECF system.

I declare under penalty of perjury under the laws of the United States of America that
the foregoing is true and correct.

DATED this 16th day of October, 2019 at Seattle, Washington.

By: *s/Linnea Butler*
Linnea Butler, Legal Assistant
601 Union Street, Suite 1500
Seattle, Washington 98101-1363
Telephone: (206) 622-5511
Fax: (206) 622-8986